



upon the Defaulting Defendants who have failed to appear was not required under Federal Rule of Civil Procedure 5(a)(2).

3. The time for the Defaulting Defendants to answer or otherwise respond to the Amended Complaint has now expired. The Defaulting Defendants who have appeared were served with the Amended Complaint via ECF on August 12, 2025. As a result, they were required to respond to the Amended Complaint by August 26, 2025.

4. To date, the Defaulting Defendants have failed to file an answer, motion, or other responsive pleading regarding the Amended Complaint. They are not infants, incompetent persons, or in the military service of the United States.

5. Accordingly, Plaintiff respectfully requests that the Clerk of Court enter default against each of the following Defendants:

**A. Defendants Previously Subject to Clerk's Entry of Default (Doc. 126)**

Plaintiff renews its request for entry of default as to the following Defendants, against whom the Clerk previously entered default at Doc. 126:

- Hanxin Carfts Factory (Defendant No. 2)
- zhangfujia (Defendant No. 18)
- Ten Billion (Defendant No. 33)
- Ruwanpatanuranga0 (Defendant No. 37)
- Lucky Lantern (Defendant No. 42)
- Lucky Cat Curiosities (Defendant No. 43)
- Panda's Pick (Defendant No. 44)
- Sweet Valley Harbor (Defendant No. 45)
- TK TOY STORE (Defendant No. 46)
- Pretty&Perfect Parior (Defendant No. 47)

- ToyJoyful (Defendant No. 50)
- ketchumsen (Defendant No. 51)
- Tailored Toys Store (Defendant No. 52)
- Prime Tree007 (Defendant No. 53)
- Crazy Qin (Defendant No. 54)
- GGOSDHU (Defendant No. 55)
- Animal Kingdom Cool (Defendant No. 56)
- Wild Treasure Fusions (Defendant No. 57)
- CONCHSERVICESLLC (Defendant No. 58)
- FOTN (Defendant No. 59)
- xiamenxiangzechengdianzikejiyouxiangongsi (Defendant No. 61)
- caochunruidexiaodian (Defendant No. 65)
- xiamenxiangzechengdianzi (Defendant No. 68)
- Lucky Panda Express (Defendant No. 69)
- one hundred billion (Defendant No. 70)
- haylpa\_63 (Defendant No. 74)
- JiaJia Goods (Defendant No. 75)
- frankcara-64 (Defendant No. 79)
- sarimart (Defendant No. 82)
- mifsud\_0 (Defendant No. 83)
- allseasonsshoppe (Defendant No. 84)
- excellent-seller03 (Defendant No. 86)
- rosefaizal01 02 (Defendant No. 88)
- ThisNerdyHome (Defendant No. 89)
- mustapha1 2 (Defendant No. 90)
- cjphyaut (Defendant No. 91)

- hsully (Defendant No. 92)
- eperfectdeal (Defendant No. 93)
- cekaea (Defendant No. 94)
- eiident (Defendant No. 95)
- dinerwish (Defendant No. 97)
- arnchamp98 (Defendant No. 99)
- mohd\_faizal10 (Defendant No. 100)
- aristid-16 (Defendant No. 102)
- jacobleve\_9171 (Defendant No. 104)
- proygh (Defendant No. 105)
- udjueny (Defendant No. 107)
- yonsh\_40U (Defendant No. 108)
- Pine Forge Glade (Defendant No. 112)
- KWV (Defendant No. 113)
- Flare Ivy Cobalt Basil (Defendant No. 114)
- Kncuisurngdrhdth shop (Defendant No. 115)
- Miracle DM Toys (Defendant No. 116)
- Tesser Department Store (Defendant No. 117)
- Dtfair (Defendant No. 118)
- Yinshang Department Store (Defendant No. 119)
- American Heritage Academy (Defendant No. 120)
- tabii.shop (Defendant No. 121)
- BNINOSHOPS (Defendant No. 146)
- Banlight/Banling (Defendant No. 161)
- ZHIYUCOME (Defendant No. 189)
- Yubatuo (Defendant No. 192)

- Fuderu (Defendant No. 193)
- Kevche (Defendant No. 194)
- PURJKPU (Defendant No. 195)
- YOLAIRD (Defendant No. 197)
- Swiien (Defendant No. 205)
- Biyunhua (Defendant No. 206)
- YHJDKIOUS (Defendant No. 207)
- Yinmgmhj (Defendant No. 208)
- Auxuper (Defendant No. 209)
- BAOYA (Defendant No. 211)
- indepenlibr (Defendant No. 216)
- SHENTHINK (Defendant No. 218)
- foshanshichongjidishangmao (Defendant No. 223)
- zz (Defendant No. 225)
- SDALU (Defendant No. 226)
- SHFY (Defendant No. 227)
- Luampo (Defendant No. 228)

**B. Defendants Previously Subject to Plaintiff's Request for Default  
(Docs. 125 and 143)**

Plaintiff renews its request for entry of default as to the following Defendants, for whom Plaintiff previously requested default at the noted Docket Entries:

**1. Doc. 125:**

- KKETSY (Defendant No. 5)
- Happy tee (Defendant No. 8)
- Happy shopping Up (Defendant No. 9)
- New life toy (Defendant No. 11)

- Chosen Son LXH (Defendant No. 13)
- Mellow Marvels (Defendant No. 15)
- zhenpengda (Defendant No. 132)
- xiamenxiangzechengdianziik (Defendant No. 140)
- Vibbang (Defendant No. 150)
- XUDUOO (Defendant No. 151)
- CHANCCI (Defendant No. 152)
- Viceda (Defendant No. 153)
- KOLGEIKJ (Defendant No. 154)
- EGSUFU (Defendant No. 155)
- lasuroa (Defendant No. 156)
- Gopherwood (Defendant No. 157)
- Quixion (Defendant No. 158)

## **2. Doc. 143:**

- KARRY HOME (Defendant No. 122)
- Barsha Space (Defendant No. 128)
- ZZZYZ (Defendant No. 136)
- shaoxingxiangrui (Defendant No. 138)
- Epsilon (Defendant No. 168)
- Tusiyou (Defendant No. 183)
- NJKAHA (Defendant No. 200)
- XKOOKI (Defendant No. 201)
- XSLBTOP (Defendant No. 202)
- XXYoung (Defendant No. 203)
- Bobodang (Defendant No. 204)
- Cyence (Defendant No. 212)

- Coiaqel (Defendant No. 214)
- Nyzmy (Defendant No. 222)

### **C. Newly Defaulting Defendants**

Plaintiff additionally requests entry of default against the following defendants, who appeared, filed a Rule 12 motion regarding the original complaint on July 21, 2025 (Doc. 130), withdrew that motion on July 30, 2025 (Doc. 135) such that the Court ordered it termed as moot (Doc. 137), and filed another motion not authorized by Rule 12<sup>1</sup> with respect to the original Complaint on July 31, 2025 (Doc. 138), but have not responded to, filed a motion regarding, or otherwise defended regarding the Amended Complaint:

- Heyisail (Defendant No. 20)
- Flownwing (Defendant No. 21)
- RR with Giftspockets (Defendant No. 30)
- Yoyocats-official (Defendant No. 31)
- Inspired Household (Defendant No. 159)
- AWishDay (Defendant No. 160)
- Dodorado (Defendant No. 162)
- Infinitias (Defendant No. 163)

### **CONCLUSION**

WHEREFORE, Plaintiff respectfully requests that the Clerk of the Court enter a default against each of the Defaulting Defendants named herein pursuant to Federal Rule of Civil Procedure 55(a).

Dated: September 4, 2025

Respectfully submitted,

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<sup>1</sup> Defendants styled their pending motion as a Rule 12 motion. But as Plaintiff noted in response, since the motion is not properly a Rule 12 motion, it does not toll any responsive pleading deadlines, which have passed. Doc. 160 at 1-2 and n.3; Fed. R. Civ. P. 12(a)(4).

/s/ G. Edward Powell III

Chanelle R. Acheson (BPR No. 30008)

W. David Bridgers (BPR No. 16603)

G. Edward Powell III (CA Bar #324530)

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## **CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2025, a true and correct copy of the foregoing PLAINTIFF'S RENEWED REQUEST FOR ENTRY OF DEFAULT will be served upon the Defendants listed in Schedule A to the Complaint via the alternative methods of service previously authorized by this Court's Order dated April 22, 2025, including service by electronic mail to the email addresses identified for each Defendant and/or by publication, as set forth in said Order. Service on all Defendants who have appeared will additionally be made via ECF.

/s/ G. Edward Powell III  
G. Edward Powell III